

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
YELLOW CORPORATION, <i>et al.</i> <sup>1</sup>	)	Case No. 23-11069 (CTG)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	Hearing Date: October 23, 2023 at 10:00 a.m. EST
	)	Objection Deadline: October 11, 2023 at 5:00 p.m. EST

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**NOTICE OF MOTION OF LAWRENCE NOWICKI  
FOR RELIEF FROM THE AUTOMATIC STAY PURSUANT TO  
11 U.S.C. § 362(d) OF THE BANKRUPTCY CODE**

TO:

Michael Esser, Esquire Kirkland & Ellis LLP 555 California Street 27 <sup>th</sup> Floor San Francisco, CA 94104	Whitney C. Fogelberg, Esquire Richard U.S. Howell, Esquire Casey McGushin, Esquire Conor P. McNamara, Esquire Patrick J. Nash, Esquire David Seligman, Esquire Kirkland & Ellis LLP 300 North LaSalle Chicago, IL 60654
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Epiq Corporate Restructuring, LLC	

<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 10990 Roe Avenue, Overland Park, Kansas 66211.

[www.epiqsystems.com](http://www.epiqsystems.com)

777 Third Avenue, 12th Floor  
New York, NY 10017

Lawrence Nowicki (“Movant”) has filed the attached Motion For Relief From Automatic Stay Pursuant to 11 U.S.C. § 362(d) of the Bankruptcy Code (the “Motion”) which seeks an order lifting the stay to allow certain state court litigation to proceed in New York.

**HEARING ON THE MOTION WILL BE HELD ON OCTOBER 23, 2023 at 10:00 a.m.**

You are required to file a response (and the supporting documentation required by Local Rule 4001-1(c)) to the attached motion at least seven days before the above hearing date with the Clerk of the Bankruptcy Court for the District of Delaware.

At the same time, you must also serve a copy of the response upon Movant’s counsel:

Louis J. Rizzo, Jr., Esquire  
Reger Rizzo & Darnall LLP  
Brandywine Plaza West  
1521 Concord Pike, Suite 305  
Wilmington, DE 19803  
(302) 477-7100

The hearing date specified above may be a preliminary hearing or may be consolidated with the final hearing, as determined by the Court.

The attorneys for the parties shall confer with respect to the issues raised by the motion in advance for the purpose of determining whether a consent judgment may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent and validity of any security instrument.

**REGER RIZZO & DARNALL LLP**

/s/ Louis J. Rizzo, Jr., Esquire

Louis J. Rizzo, Jr., Esquire (#3374)  
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1521 Concord Pike, Suite 305  
Wilmington, DE 19803  
(302) 477-7100  
Attorney for Movant,  
Lawrence Nowicki

Dated: September 26, 2023